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MARKET SQUARE
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WASHINGTON, D.C. 20004
202 508-4000

29 July 1993

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NEW YORK, N.Y. 10019-4097
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FEDERAL COMMUNICATIONS COMMISSION
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BY HAND

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

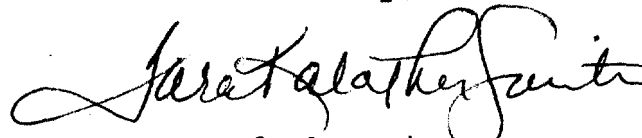
Re: ET Docket No. 93-198.

Dear Mr. Caton:

Enclosed please find an original and ten copies of the "Reply Comments of AfriSpace Corporation" in the above referenced docket. We have enclosed sufficient copies for each of the Commissioners to receive a copy. Additionally, there is an extra copy to be stamped and returned to the messenger.

Thank you for your attention to this matter. Please contact the undersigned if there are any questions regarding this filing.

Yours sincerely,


Tara Kalagher Giunta

Enclosures

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
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Preparation for International)
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points are especially true for systems, such as AfriSpace, that will use the 1452-1492 MHz band for international BSS(sound).

The National Academy of Sciences' Committee on Radio Frequencies ("CORF") took no position on the need to place BSS(sound) issues on the agenda of either WRC-95 or WRC-97. However, it expressed concern about out-of-band emissions from BSS(sound) operations in the 1452-1492 MHz band and reminded the Commission of the need to protect Radio Astronomy Service operations in the 1400-1427 MHz band. (CORF at pp. 4-5.)

AfriSpace agrees and notes that actual experience with operation of BSS(sound) systems in the upper 25 MHz of the 1452-1492 MHz band will demonstrate whether there is a genuine problem with out-of-band emissions interfering with Radio Astronomy Service operations. Given the timetable for the launch and operation of AfriSpace -- the first system to use this band -- it will be better to postpone consideration of BSS(sound) issues until WRC-97, at the earliest, and, more probably, not until a later conference.¹

The overwhelming majority of commenters stressed the need for greater attention to Mobile Satellite Service (MSS) and High Frequency (HF) broadcasting issues at the upcoming WRCs. We understand their positions and ask only that the United States take no action or position at the WRCs which might indirectly

¹ Motorola's comments coincide with AfriSpace's position, as well. Motorola states that it understands there to be no advantage to proposing that BSS(sound) planning be placed on the agenda of an upcoming WRC. (Motorola at p. 16.)

jeopardize the successful introduction and ongoing operation of commercial BSS(sound) operations.

In summary, the allocations given to BSS(sound) at the 1992 World Administrative Conference ("WARC") are sufficient for the implementation of first generation BSS(sound) systems. Further operational experience is required before informed positions can be adopted concerning outstanding BSS(sound) issues. Therefore, if possible, BSS(sound) issues should be put off until the WRC in 1999 or later, if possible. If there is international consensus to keep to the timetable established in RES528 of WARC-92 for a competent conference to address such issues before 1998, then these issues could be placed on the agenda for WRC-97.

Respectfully Submitted,

Karakalash S. T.